

From: Rand Crafts
To: mradulov@deq.state.ut.us
Date: Monday, September 24, 2001 9:43:51 AM
Subject: IPSC Dense Pack AO Draft

Milka,

I have gone over the draft AO. The following are my comments and questions, including some of those we covered Friday together.

On Page 1, last paragraph for amending the Title V permit, it states that the Title V only needs to be administratively amended. Is this correct? No public input needed once the AO is issued?

On Page 3 and at other locations, it refers to our latest AO DAQE-749-01 of 9/11/2001. Has the signed version of this been sent out? I haven't seen it yet.

On Page 4, more references to administratively amending the Title V are present in the paragraphs just preceding the heading "Newspaper Notice" and just following.

Also, on Page 4, the paragraph just preceding the heading "Newspaper Notice" contains amounts of emission changes. I will review these further and provide corrections as necessary.

On Page 5, in item #3 where you cut and pasted directly from our NOI, the last sentence may read better as: "The mass flow of chimney effluent may change proportionately with the change in heat input." The previous language was confusing to me at first, and I wrote it.

Also, The last sentence in Item 3 lists pollution control equipment. Since we are describing them further in Item four, you may want to add auxilliary equipment dust collectors to this list.

In Item 4 on Page 5, the very last sentence refers to new BACT for NOx, which is now not the case.

In Item 5, describing the location of the stack emissions, we could refer to the emissions from other points in a general manner. You might add a sentence that states something like "Other emission points such as coal handling equipment and cooling towers are located on the same site proximate to the chimney coordinates."

As we discussed on Friday, Item 6 does not need to reference any monitoring from 40 CFR 60 Subpart Y, found at 40 CFR 60.250 to 60.254. These require monitoring of thermal dryers and venturi separators only.

In Item 9, on Page 7, under the heading "Boiler Safety Valve Additions" we should remove the terms "we" and have the sentence read "IPSC will replace one existing electro relief valve (ERV) with one main steam safety valve on each unit."

On page 8, at the end of Section I, right after or just before "PRODUCTION SUMMARY" you might refer to the State's tightening of permit limits to ensure control of emissions from the project.

Again, I will review the numbers in Section II concerning emissions.

In Section V conditions for the new AO, in Condition 8 on Page 12 it refers to our main boilers at 8500mmbtu/hr or equivalent. Since we are uprating, should we refer to these as 9225mmbtu/hr, or will it be understood that we are operating at higher heat inputs? If so, I think this needs to be specifically discussed somewhere in the AO terms for compliance purposes. The same identifying reference is found at Condition 9, and again in Condition 16.